

# **EXHIBIT A**



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September 3, 2009

**Via Electronic Mail**

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Re: *In re Digitek Products Liability Litigation* (MDL Docket No. 1968)

Dear Counsel:

Pursuant to our call, below are depositions that can be taken without first receiving further documents and custodial files.

Please provide available dates for the following Actavis Employees:

- 1) Kwame Adjei
- 2) Allen Gamble
- 3) Rich Mayo
- 4) Shonise Moses
- 5) Eamonn Murphy
- 6) Anilkumar Patel
- 7) Narendrakumar J. Patel
- 8) Lourdes Reyes
- 9) Bakul J Shah
- 10) Shawn Summers
- 11) Mark Tolle

Of Course, if it is discovered that any of the above deponent was involved in the recall of Digitek or any other Little Falls product, we will adjourn the deposition and resume when documents are produced.

The following depositions need to be scheduled as well.

- 1) Doug Booth
- 2) Dandy Dorado
- 3) Rick Dowling
- 4) Wanda Eng
- 5) Paul Galea
- 6) Jacob Haroon
- 7) Wilhelm Kempf
- 8) Alpesh Kinkhabwala

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September 3, 2009  
Page 2 of 2

- 9) John LaRocca
- 10) Terry Nataline
- 11) Siggi Oli Olafasson
- 12) Divya Patel
- 13) Kailash Patel
- 14) Jeffrey Rope
- 15) Binal Shah
- 16) Kalpesh H. Shah
- 17) Misbah Sherwani
- 18) Dorothy Sobczyk
- 19) Roychowhury Swapan
- 20) Chris Young
- 21) Jisheng Zhu

Plaintiffs are willing to schedule these depositions as documents are produced including responses to outstanding discovery requests and custodial files for requested deponents. Further, Plaintiffs request that a deposition is not scheduled less than two weeks after receiving such custodial file.

As soon as you give us suitable dates we will begin noticing depositions.

Respectfully submitted on behalf of the Plaintiffs' Steering Committee,



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cc (via email):

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